

August 2, 2007

Mr. Christopher A. Whyrick
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RAI) dated July 5, 2007, referencing the April Quarterly FEC Report (1/1/07 - 3/31/07). The Committee's response follows.

Schedule A-P

From its inception, the Committee implemented stringent internal controls relative to contribution solicitations (informing potential donors of both source and limit prohibitions), receipts processing, and compliance follow-up procedures that fully comply with federal regulatory guidelines. Based on the Committee's regular compliance procedures and the information in the Committee's possession, all donations received that exceed the contribution limits are either reattributed, redesignated, or refunded within the 60-day time period as set forth in 11 CFR 110 and as noted in the memo text on all such transactions itemized in the Committee's public disclosures.

Specifically, for each of the donors identified in your RAI (with the exceptions noted below), the Committee executed a reattribution, redesignation, or refund within the permitted time period. As such, the Committee believes that it has reported properly its intended actions with respect to these donors in both its April Quarterly Report and its July Quarterly Report (4/1/07 - 6/30/07), on Schedules A-P.

For the two contributors listed below, the Committee subsequently has obtained new information supplied by the contributor and the Committee has made the necessary corrections which are reflected in the amended April Quarterly Report (1/1/07 - 3/31/07) submitted on August 2, 2007.

1. Ford, Richard - Aggregate cycle to date amount has been changed, the associated memo text has been changed to reflect the Committee's intent to refund the excessive portion, and the excessive portion of the donor's contribution was refunded on 7/19/07 and will be reported on Schedules A-P and B-P of the Committee's October Quarterly. (See page 964, Schedule A-P, April Quarterly, amended).

2. Rivera, Alan - Aggregate cycle to date amount has been changed, the associated memo text has been changed to reflect the Committee's intent to refund the excessive portion, and the excessive portion of the donor's contribution was refunded on 7/19/07 and will be reported on Schedules A-P and B-P of the Committee's October Quarterly. (See page 2406, Schedule A-P, April Quarterly, amended).

Schedule B-P

11 CFR 104.3(b)(3)(i)(B) provides several examples of acceptable purposes that committees may use in describing

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disbursement transactions on financial disclosure reports. In addition, in an effort to comply with both the text and spirit of the public disclosure regulations, the Committee consulted the Commission's Statement of Policy on Purpose of Disbursement reporting, 72 FR 887 (1/9/07) "Examples of Inadequate Purposes" list, which was revised on 3/5/07 and publicly disseminated by the Commission. Using these sources, the Committee has described the transactions cited in the RFAI in accordance with all published guidelines that are available to the regulated community. Moreover, there is no indication in the regulations or Commission guidelines that the amount of a particular expenditure requires any different consideration with respect to the list of sufficient or insufficient descriptions for the purpose of disbursement. As such, the Committee believes that it has satisfied the legal requirements to itemize completely the referenced disbursement transactions on its April 2007 Quarterly Report and that no additional clarification is required.

Sincerely,

John H. Gross
Treasurer